IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

HYUNDAI MOTOR AMERICA, INC. and HYUNDAI MOTOR COMPANY,)))
Plaintiffs,))
) Civil Action No. 3:17-cv-732
VS.)
) JURY TRIAL DEMANDED
DIRECT TECHNOLOGIES)
INTERNATIONAL, INC. d/b/a DTI, INC.)
)
Defendants.)
)
)

DEFENDANT/COUNTERCLAIMANT DIRECT TECHNOLOGIES INTERNATIONAL, INC.'S MOTION TO SEAL

Pursuant to Fed. R. Civ. P. 5.2(d) and Local Rule 6.1, Defendant/Counterclaimant Direct Technologies International, Inc. ("DTI") respectfully moves this Court for entry of an Order granting DTI authorization to file the following documents under seal: DTI's Memorandum in Support of Its Motion for Partial Summary Judgment on Its Counterclaims for False Advertising, Unfair Competition, and Unfair and Deceptive Trade Practices ("Memo") and Exhibits 2-5 to the Memo. DTI is filing concurrently herewith a redacted version of its Memo. DTI seeks to file these documents under seal because Hyundai Motor America, Inc., Hyundai Motor Company (collectively, "Hyundai") and DTI (collectively, the "Parties") have designated these documents "Confidential Business Information, Subject to Protective Order" pursuant to a Confidentiality Agreement and Protective Order in this matter, and therefore DTI maintains that they contain references to the Parties' sensitive, private, proprietary, and confidential information. The grounds for this Motion are more fully set forth in the DTI's Memorandum in Support of Its

Motion to Seal, filed contemporaneously herewith.

Pursuant to Local Rule 7.1(B), DTI conferred in good faith with counsel for Hyundai.

Counsel for Hyundai has indicated that Hyundai will not oppose DTI's Motion to Seal.

This the 12th day of December, 2019.

Respectfully submitted,

s/Lucas D. Garber

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CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will automatically and electronically notify all counsel of record in this case.

s/Lucas D. Garber

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